



**NELSON • LEVINE • de LUCA & HAMILTON**

A LIMITED LIABILITY COMPANY

**ATTORNEYS AT LAW**

NEW YORK PENNSYLVANIA WASHINGTON, DC OHIO NEW JERSEY LONDON

www.nldhlaw.com

May 21, 2012

**Via ECF**

Honorable Patty Schwartz, U.S.M.J.  
U.S. District Court, District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07101

Re: *In re Insurance Brokerage Antitrust Litigation*  
D.N.J. Case No.: 2:04-CV-05184-CCC-PS (MDL No.: 1663)  
*New Cingular Wireless Headquarters LLC v. Marsh & McLennan Cos., Inc.*

Your Honor:

I am the attorney of record for Zurich American Insurance Company, American Guaranty and Liability Company, Zurich American of Illinois, Empire Fire & Marine Insurance Company, Fidelity & Deposit Company of Maryland, and Zurich Specialties London Limited, defendants in the *New Cingular Wireless Headquarters LLC v. Marsh & McLennan Cos., Inc.*, Civil Action No. 06-5120, a tag-along “member case” in the above referenced litigation. Based on our understanding of Katten Muchin Rosenman LLP’s discussion with chambers noted in its letter to the Court dated May 18, 2012 (Document 2003), enclosed please find a copy of an executed Declaration Concerning Material Covered by Discovery Confidentiality Order dated May 10, 2012, wherein I agree to be bound by such Order.

Respectfully submitted,

**NELSON LEVINE de LUCA & HAMILTON**

/s/ Kymberly Kochis

Kymberly Kochis

Enclosure

cc: All Counsel of Record (via ECF)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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IN RE: INSURANCE BROKERAGE  
ANTITRUST LITIGATION

MDL No. 1663  
Civil No. 04-5184 (FSH)

**APPLIES TO ALL ACTIONS**

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IN RE: EMPLOYEE-BENEFIT INSURANCE  
BROKERAGE ANTITRUST LITIGATION

Civil No. 05-1079(FSH)

**APPLIES TO ALL ACTIONS**

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**Exhibit A  
Declaration Concerning Material Covered by  
Discovery Confidentiality Order**

I, the undersigned, hereby declare that I have read the attached Discovery Confidentiality Order entered in the coordinated and consolidated actions before the District of New Jersey entitled In re: Insurance Brokerage Antitrust Litigation, Civil Action No. 04-5184 and In Re: Employee Benefit Insurance Brokerage Litigation, Civil No. 05-1079. I understand the terms of this Discovery Confidentiality Order.

I will comply with all of the provisions of the Discovery Confidentiality Order. I will hold in confidence, will not disclose to anyone not qualified under the Discovery Confidentiality Order, and will use only for the purposes expressly set forth in the Discovery Confidentiality Order, any Confidential Information or Attorneys' Eyes Only Information, including the substance and any copy, summary, abstract, excerpt, index, or description of such material that is disclosed to me. I agree to submit to the personal jurisdiction of the District of New Jersey in any proceeding related to the enforcement of this Discovery Confidentiality Order, including any proceedings related to contempt of Court. At the conclusion of my involvement in this matter, I agree to return all Confidential Information or Attorneys' Eyes Only Information which comes into my possession, and all documents and things that I have prepared relating thereto, to counsel from whom I received such materials.

I declare that the foregoing is true and correct. I understand that if any of the statements made by me are willfully false, I am subject to punishment.

Name of Individual: Kymberly Kochis

Present occupation/job description: attorney

Name of Company or Firm: Nelson Levine de Luca & Hamilton

Address: 1 Battery Park Plaza - 32nd Floor, New York, NY 10004

Telephone No.: 212 233-2906

Relationship to this action and its parties: Zurich American Insurance Company,

American Guaranty and Liability Company, Zurich American  
of Illinois, Empire Fire & Marine Insurance Company,  
Fidelity & Deposit Company of Maryland, and Zurich Specialities  
London Limited  
Dated: 5/10/12

Kymberly Kochis  
Signature